

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Jonatan E. Lopez-Martinez	:	Chapter 13
Stephanie J. Sitler	:	Case No. 19-16785-ELF
Debtor(s)	:	

RESPONSE TO THE MOTION FOR RELIEF OF AUTOMATIC STAY
FILED BY AURORA FINANCIAL GROUP, INC.

Debtors, Jonatan Lopez-Martinez & Stephanie Sitler, by and through their undersigned Counsel, Brad J. Sadek, in response to the Motion for Relief filed by Aurora Financial Group, Inc., hereby submits the following:

1. Admitted
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted payments were missed. Debtors ask for the chance to cure.
7. Debtors are unsure of the same and request the chance to cure the post-petition arrears through a Modified Plan.
8. Denied. Debtors respectfully request the chance to cure the post-petition arrears.
9. No response required.

WHEREFORE, based on the aforementioned, Debtor respectfully requests that Movant shall be denied an Order granting relief of the Automatic Stay pursuant to 11 U.S.C. § 362.

Dated: June 2, 2022

/s/ Brad J. Sadek, Esq.

Brad J. Sadek, Esq.
Attorney for the Debtor
Sadek & Cooper
1315 Walnut Street, #502
Philadelphia, PA 19107
(215) 545-0008

CERTIFICATE OF SERVICE

I, Brad J. Sadek, Esq. certify that on the date indicated below served a true and correct copy of the Debtor's Response to the Motion for Relief from Automatic Stay by electronic or Regular U.S. Mail on all creditors and the following parties:

Kenneth E. West, Esq.
Standing Chapter 13 Trustee
Electronic Notice

Rebecca A. Solarz, Esq.
Attorney for Movant *Aurora Financial Group, Inc.*
Electronic Notice to *bkgroup@kmlawgroup.com*

Dated: June 2, 2022

/s/Brad J. Sadek, Esq.
Brad J. Sadek, Esq.
Attorney for Debtor
1315 Walnut Street
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